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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AOB PRODUCTS COMPANY)	
)	Case Number: 1:24-cv-00472
Plaintiff)	
)	Judge: Hon. John F.Kness
v.)	
NANYANG JIANLING TRADING)	Magistrate Judge: Hon. Sunil R. Harjani
CO., LTD.)	
Defendant)	

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UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

_ Attorney for Plaintiff AOB Products Co.

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: _____

(To be supplied by the Clerk of this Court)

_ Nanyang Jianling Trading Co., Ltd.

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

_____ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

_____ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

_____ OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

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- I. Plaintiff(s):_
- A. Name: Devon C. Beane
- B. List all aliases: Attorney for Plaintiff AOB Products Co
- C. Prisoner identification number: _____
- D. Place of present confinement: 70 W.Madison St., Suite3300, Chicago, IL 60602
- E. Address: 70 W.Madison St., Suite3300, Chicago, IL 60602

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

- II. Defendant(s):
- (In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)
- A. Defendant: Nanyang Jianling Trading Co.,Ltd.
- Title: corporation
- Place of Employment: Meixi Street Yiyuan Community Nanyang City Wolong District Henan 473000 CN
- B. Defendant: _____
- Title: _____
- Place of Employment: _____
- C. Defendant: _____
- Title: _____
- Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: _____

B. Approximate date of filing lawsuit: _____

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

D. List all defendants: _____

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____

F. Name of judge to whom case was assigned: _____

G. Basic claim made: _____

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. COPLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ASE NUMBER: 1:24-cv-00472 Detailed description of the case

ASSIGNED JUDGE: Hon. John F.Kness

ADING CO., DESIGNATED

MAGISTRATE JUDGE: Hon. Sunil R. Harjani

Case No. 1:24-cv-00472 Filing time: 2024.8.27

Attorney : for Plaintiff AOB Products Co

AOB Acting lawyer: Devon C.Beane

The subpoena we received via email from AOB on August 30, 2024 is incredible

Because the end of last year has been explained to the company, at that time the other party did not say anything. We think we're on the same page

Our company is a foreign trade company with no design, production and processing capabilities. We only purchase products from other companies for trading. Due to multiple crackdowns by AOB company, we have accumulated more than 6000 sets of products and closed our inventory in our warehouse in China on 2024 January 19th year. Due to the ban on sales, we owe a large amount of funds to the processing manufacturers, have been sued multiple times, and our personnel have become untrustworthy. We had to apply for a change to a personal store on the Amazon platform in February, because if we still can't hold on like this, we plan to close the store and switch to a domestic store in China. When we received the first letter from AOB company, we immediately contacted the supplier to make a lot of modifications, as shown below. (This product is a second-generation product)

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Since our after-sales service period is two years, sometimes it is possible that other people's returns, Amazon will carry out secondary sales. However, since January 2024 year, we have not sent the products shown in the following picture to the Amazon warehouse.



(This product is a first-generation product)

We don't want to compete with AOB for a long time. We just want to do good business and serve the American people well. To provide the American people with quality services and inexpensive goods. Let people from all walks of life in the United States have access to our goods and reduce their financial expenses.

In addition, we have specifically noted in the product description that the products we sell are not from the company, allowing everyone to choose whether to purchase or not. At the same time, in order to better distinguish ourselves from them, we have made multiple upgrades and changes, as shown in the following figure. (This product is a third-generation product).

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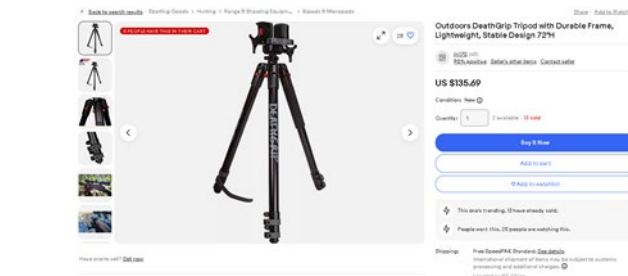
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In order to completely differentiate ourselves from the AOB company products, we have updated our fourth generation products and added our trademark. As follows.



Due to the chaotic supplier management of AOB company, AOB's original products have been sold by Chinese sellers in multiple stores such as EBAY or other e-commerce platforms. At the same time, I found that the components in the products sold on Amazon and the original products of AOB company come from the same mold, and I have never seen their company stop them. Why do they repeatedly suppress our company?



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Outdoors DeethGrip Tripod w/ Durable Frame, Lightweight, Stable Design 72H

US \$144.99

Buy it Now

Add to cart

Make offer

Watch to wishlist

Explore related items

Recently viewed items

Item	Price	Best Offer	From	Sold	Watchers
Stable & Lightweight Tripod DeethGrip...	\$140.99	or Best Offer	from China	13 sold	
Outdoors DeethGrip Tripod with Durable...	\$135.69	Buy it Now	from China	13 sold	
Outdoors DeethGrip Tripod w/ Durable...	\$144.99	or Best Offer	from China	38 sold	
Outdoors DeethGrip Tripod with Durable...	\$135.00	or Best Offer	from China		9 watchers
US Outdoors DeethGrip Tripod with Durable...	\$141.99	or Best Offer			
US Outdoors DeethGrip Tripod with Durable...	\$135.00	or Best Offer	from China		6 watchers

D360 pro Hunting Tripods with Aluminum 360 Degree Ball Head, Adjustable Legs, for Hunting Shooting Tripod

\$127.77

Buy it Now

Add to cart

Make offer

Watch to wishlist

Explore related items

Recently viewed items

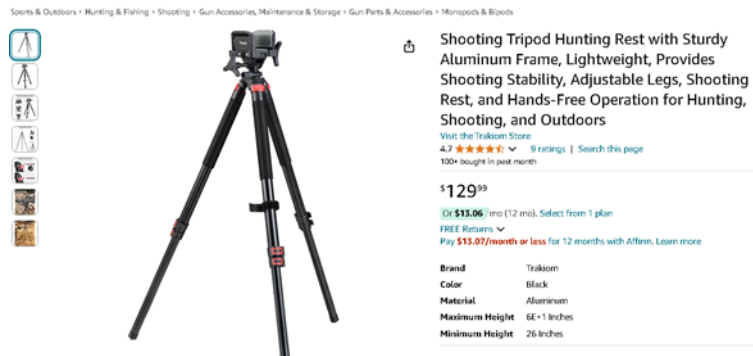
Item	Price	Best Offer	From	Sold	Watchers
D360 pro Hunting Tripods with Aluminum 360 Degree Ball Head, Adjustable Legs, for Hunting Shooting Tripod	\$127.77	Buy it Now			

https://www.amazon.com/TKKOK-Hunting-Aluminum-Adjustable-Shooting/dp/B0D2GVN5NZ/ref=rvi_d_sccl_1/141-0653756-0624308?pd_rd_w=2qAb6&content-id=amzn1.sym.f5690a4d-f2bb-45d9-9d1b-736fee412437&pf_rd_p=f5690a4d-f2bb-45d9-9d1b-736fee412437&pf_rd_r=8NVZBNVWKG3ZQ0QV5CAR&pd_rd_wg=pvqhW&pd_rd_r=58b4b10e-36e3-4075-bd01-7772b72471a9&pd_rd_i=B0D2GVN5NZ&psc=1

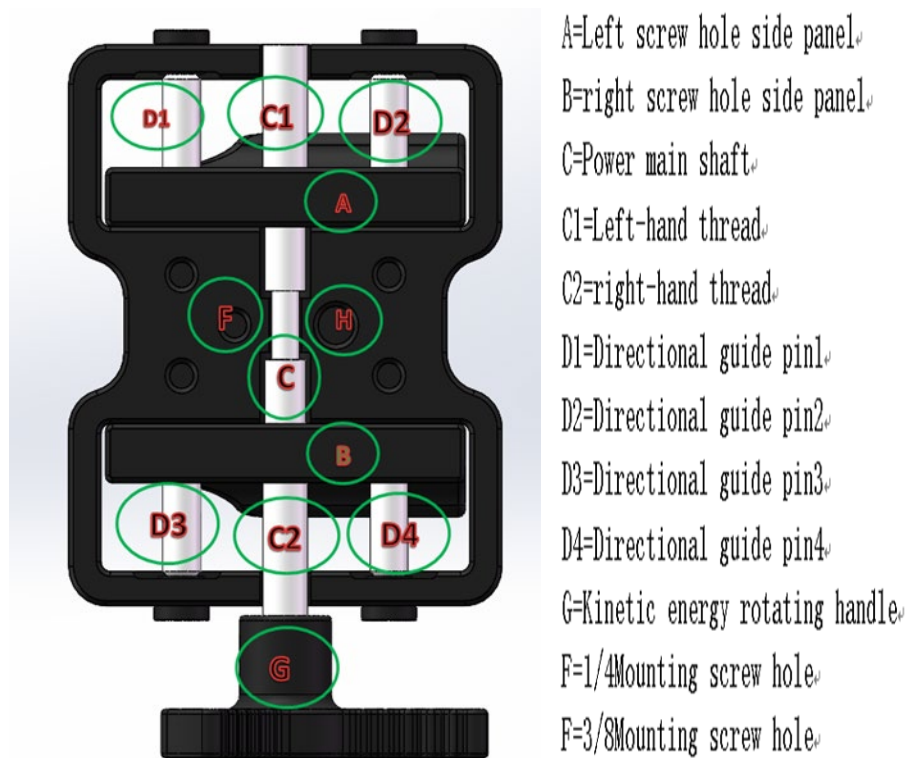
https://www.amazon.com/dp/B0CR5G6DW8/ref=sspa_dk_detail_0?psc=1&pd_rd_i=B0CR5G6DW8&pd_rd_w=2DDaa&content-id=amzn1.sym.953c7d66-4120-4d22-a777-f19dbfa69309&pf_rd_p=953c7d66-4120-4d22-a777-f19dbfa69309&pf_rd_r=P8410ADPX6Q44Q7V51X6&pd_rd_wg=HPLhA&pd_rd_r=0c7e8e56-3fb8-47b2-8f10-17a43246fa1d&s=sporting-goods&sp_csd=d2lkZ2V0TmFtZT1zcF9kZXRhaWwy

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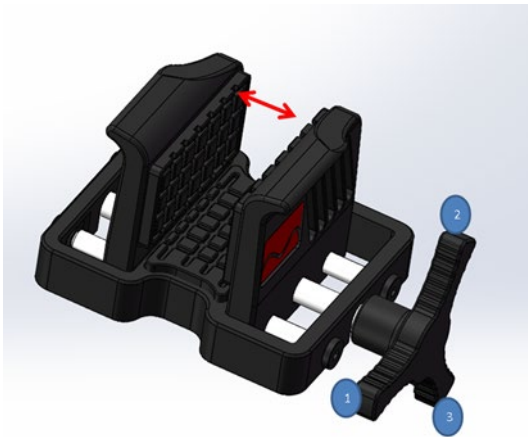


The AOB took us to court, and the infringing product the AOB sued was only our first generation product. However, I found many differences between our first generation product and AOB's US patent 10,514,225 B2. As is shown in the picture below.



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When closed at the same time, the rotation G is opened through the 1, 2, 3 running track



When closed at the same time, the rotation G is opened through the 3, 2, 1 running track

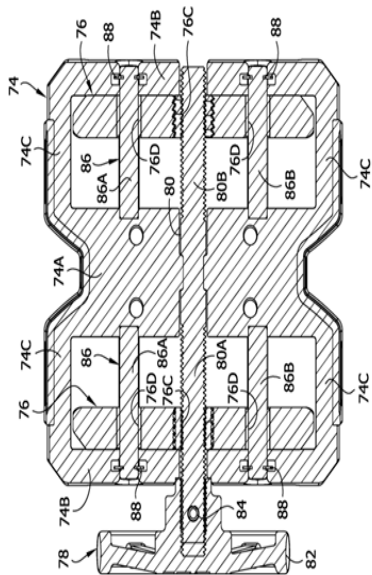


FIG. 8

76C=Internal and external tooth
transfer screw sleeve
76D=Pin steering sleeve
78= Adjustable Ambidextrous
Swivel
AOB action track: Through 78 rotation,
drive 76C and 76D,
and then to 76 and 86 for movement,

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W: Adjusting support, we don't have this.

T: Triangle frame, their product only has the shooting function when lying down or placed on the table. Our product can be used in various environments such as mountains, forests, rivers, and plains by standing, lying down, crawling, and adjusting various angles. Their product does not have these functions.

in summary:

Firstly, in terms of appearance: Their product differs from ours by over 95%; As shown in Figure 9

Secondly, in terms of invention patents: Our usage specifications, component motion trajectories, and multiple functions of the product are completely different from their products, completely exceeding their patent requirements specification US 10514225 B2. Our product has features that their patented products do not have, with a difference of over 80%.

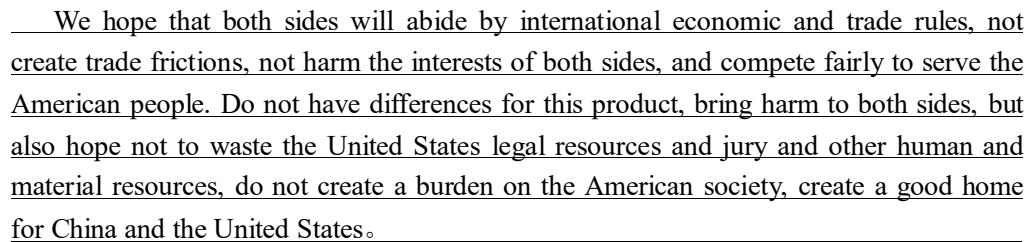
On September 13, 2023, no information was received from AOB at that time

It was not until November 6, 2023, that the Glen production manager of AOB Company in China informed us that,

We used their trademark keywords. At that time, we provided the US registered trademark R mark file and found that the registration failed in October 2023. We immediately took it down and cleared all related keywords. At the same time, we also explained this clearly to Glenn and gained understanding.

On January 19, 2024, we also received the US 10514225 B2 trademark certificate sent by AOB company. We immediately stopped all shipments from China to Amazon warehouses in the United States and closed the disputed goods in our warehouse in China.

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14.09.2024

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V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

- 1. Cancel all groundless lawsuits of AOB Company
- 2.AOB company assures us that it will not report our products for a long time in the future
- 3.AOB shall pay all expenses incurred by the Court

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 16 day of 09, 20 24

(Signature of plaintiff or plaintiffs)
Nanyang Jianling Trading Co.,Ltd.

(Print name)
Nanyang Jianling Trading Co.,Ltd

(I.D. Number)
91411303MA9LA3HE83

(Address)
Meixi Street Yiyuan Community Nanyang City Wolong District
Henan 473000 CN

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